

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ARTHUR GIANELLI,  
JOSEPH YERARDI, JR.,  
DENNIS ALBERTELLI A/K/A "FISH,"  
PHILIP PUOPOLO,  
SALVATORE RAMASCI A/K/A "LEFTY,"  
FRANK IACABONI,  
RANDY ALBERTELLI,  
STEPHEN RUSSO A/K/A "MOON,"  
MICHAEL PINIALIS A/K/A "MAX,"  
ENEYDA GONZALEZ RODRIGUEZ,  
MARY ANN GIANELLI,  
GISELE ALBERTELLI, and  
RAFIA FEGHI A/K/A RAFIA YERARDI,

Defendants.

Crim. No. 05-10003-NMG

DOCKETED

SEALED

**GOVERNMENT'S MOTION TO UNSEAL SECOND  
SUPERSEDING INDICTMENT**

The government hereby requests that the Court unseal the Second Superseding Indictment in this case.


The Second Superseding Indictment includes charges against four (4) defendants who have not previously been charged in this case. Two of the new defendants have been arrested today, and we understand that another of the new defendants is surrendering today. (The fourth new defendant is believed to be outside the United States.) Accordingly, the Second Superseding Indictment should be unsealed.

Respectfully submitted,

MICHAEL J. SULLIVAN

United States Attorney

By:

A handwritten signature in black ink, appearing to read "Michael L. Tabak", written over a horizontal line.

MICHAEL L. TABAK

Assistant U.S. Attorney

Date: September 19, 2006